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19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

21 CALIFORNIA COALITION FOR WOMEN
PRISONERS et al.,

22 Plaintiffs,

23 v.

24 UNITED STATES OF AMERICA FEDERAL
BUREAU OF PRISONS et al.,

25 Defendants.

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Case No. 4:23-cv-04155-YGR

**DECLARATION OF LUMA
KHABBAZ IN SUPPORT OF
PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CONSENT
DECREE**

Date: February 25, 2025
Time: 1:00 pm

Judge: Hon. Yvonne Gonzalez Rogers

1 I, Luma Khabbaz, declare:

2 1. I am an attorney duly admitted to practice before this Court. I am an
3 Associate in the law firm of Rosen Bien Galvan & Grunfeld LLP, counsel of record for
4 Plaintiffs and the Class. I have personal knowledge of the facts set forth herein, and if
5 called as a witness, I could competently so testify. I make this declaration in support of
6 Plaintiffs' Motion for Final Approval of Consent Decree.

7 2. Under the preliminary injunction, BOP provides Class Counsel with monthly
8 rosters of class members including a roster that lists all of the people who were housed at
9 FCI Dublin from August 16, 2023, when the Complaint in this case was filed, until the
10 closure.

11 3. As part of the process of reviewing and responding to objections to the
12 Consent Decree, I searched the name of each filer against the rosters provided by the BOP
13 as well as reviewed our internal files for any prior contacts or other information relating to
14 that filer.

15 4. The objector in Dkt. 456 (M.P.) was not listed on any roster provided by
16 BOP for people who were incarcerated at FCI Dublin after Plaintiffs' filed their Complaint
17 in August 16, 2023.

18 5. Class Counsel has mailed a letter to the objector in Dkt. 456 (M.P.)
19 informing her about the class member definition for this case. We also informed her that
20 she must separately seek any relief from the BOP. I also spoke with her personal attorney
21 to let him know that she had reached out to us in connection to this case.

22 6. The objector in Dkt. 458 (A.B.) writes about previously being housed at FCI
23 Dublin. I reviewed the spreadsheets from BOP with lists of all people housed at FCI
24 Dublin from August 16, 2023 until the closure, and this individual was not listed on any
25 rosters.

26 7. Class Counsel has mailed a letter to the objector in Dkt. 458 (A.B.) regarding
27 the class definition and providing further guidance on her concerns.

28 8. The objector in Dkt. 451 (G.F.) was listed only on a BOP-provided roster

1 that listed people at FCI Dublin after the Complaint was filed on August 16, 2023 and
2 before the class was certified on March 15, 2024.

3 9. Class Counsel has mailed a letter to the objector in Dkt. 451 (G.F.) regarding
4 the class definition and providing further guidance on her concerns.

5 10. I also reviewed the comment to the Consent Decree filed as Dkt. 448. I
6 have had multiple legal calls with the class member who filed Dkt. 448 (A.P.H.), including
7 on August 8, 2024, January 7, 2025, and January 30, 2025. Myself and other attorneys and
8 paralegals on our team have exchanged Corrlinks messages with her as well. The issues
9 raised by this objector have been the subject of the legal calls as well as many of the
10 Corrlinks messages. With the class member's permission, Class Counsel has raised these
11 issues with the Monitor through memoranda about class member concerns.

12 11. I also reviewed the comment to the Consent Decree filed by Family Violence
13 Law Center ("FVLC").

14 12. Members of the legal team, including myself, have met with FVLC and
15 discussed FVLC's comments to the Consent Decree with FVLC leadership.

16 I declare under penalty of perjury under the laws of the United States of America
17 that the foregoing is true and correct, and that this declaration is executed at San Francisco,
18 California this 14th day of February, 2025.

19
20 /s/ Luma Khabbaz

21 Luma Khabbaz
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